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September 3, 2021

Via Electronic Case Filing

Honorable Jessica S. Allen, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: 431 E. Palisades Avenue Real Estate, LLC, et al. v. City of Englewood, et al.
Docket Number: 2:19-cv-14515-BRM-JSA

Dear Judge Allen:

This firm represents Plaintiffs in the above matter. We write jointly with Defendants' counsel to provide an update with regard to In the Matter of the Application of the City of Englewood, docket number BER-L-4069-19 (the "State Court Action") and the Plaintiffs' Motion to Intervene.

Plaintiffs' Motion to Intervene was granted in April 2021 and the Plaintiffs have been actively participating in the litigation since that time. The Court has recently entered an Order directing the parties to participate in mediation before the Special Master that has been appointed in the case. This week, Plaintiffs will be submitting to the Special Master concept plans and a suitability analysis for the development of the property. After receipt and review of the concept plans, the parties will be engaging in mediation. The Court has scheduled a status conference on September 9 to discuss the mediation deadlines.

Given the above, we respectfully request the Court continue to stay this matter pending resolution of the State Court Action.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

COLE SCHOTZ P.C.

/s/ Warren A. Usatine

cc: All counsel of record